

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
IN THE SOUTHERN DISTRICT OF NEW YORK
Case No. 22-cv-10336 (AT)(GWG)
[rel. 20-cv-3389]

Local 2507, UNIFORMED EMTs,
PARAMEDICS & FIRE INSPECTORS,
individually and on behalf of its
current and former members; et al.,

Plaintiffs,

vs.

CITY OF NEW YORK on behalf of the Fire
Department of the City of New York,

Defendant.

VIDEO CONFERENCE DEPOSITION OF
ROBERT WILLIAM ALEXANDER
30(b)(6) AND FACT WITNESS

May 16th, 2023
Via Video Conference
1:00 p.m. - 5:14 p.m.

Reported by:
MARCIA L. ALF, R.P.R.
Notary Public
Job SY7237

1 that's correct.

2 BY MS. KURLAND:

3 Q. When you say by exam by exam basis, does that
4 mean that the agency has to tell you each time, okay,
5 we'd like to link these two titles up again?

6 A. That's correct.

7 Q. Do they have to give you a proposal or an
8 explanation for why they think those titles are
9 related enough such that one can promote to the other?

10 MS. MINICUCCI: Objection. You can answer.

11 THE WITNESS: They do not. Because in the
12 situations of firefighter, they are -- they are
13 titles used exclusively by the FDNY. If there
14 were to be titles outside of their purview, then
15 yes, we would have to look at some rhyme or
16 reason for the proposal. Because that could be
17 poaching from other agency's employees.

18 BY MS. KURLAND:

19 Q. For example, let's use the PAA title that you
20 talked about earlier.

21 If PAAs were not designated to be in the line
22 of promotion already into administrative managers,
23 which I think they are, let's assume for this
24 hypothetical that they weren't already determined to
25 be in the line of promotion, and the FDNY came to you